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FCC Mail Room

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June 10, 2016

Marlene H. Dortch, Secretary
Federal Communications Commission
Office of the Secretary
445 Twelfth Street S.W.
Room 5-A225
Washington, D.C. 20554

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**RE: FCC FORM 481 – CARRIER ANNUAL REPORTING DATA COLLECTION
CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE
ORDER IN WC DOCKET NO. 14-58, BEFORE THE FEDERAL COMMUNICATIONS
COMMISSION (FILED IN DOCKET 14-58) AND CONFIDENTIAL FINANCIAL
INFORMATION FILED PURSUANT TO SECTIONS .457 AND .459 OF THE FEDERAL
COMMUNICATIONS COMMISSION RULES**

Dear Ms. Dortch,

Woodhull Telephone Company (Woodhull) hereby submits the attached redacted and confidential versions of its “FCC Form 481 – Carrier Annual Reporting Data Collection” financial information pursuant to sections §54.313 and §54.422 of the Commission’s rules, as filed with the Universal Service Administrative Company.

Section 3005 of Form 481 requires the filing of financial information per 47 C.F.R. §54.313(f)(2). Woodhull maintains that this information is “Confidential Financial Information” on the grounds that it is competitively sensitive information which could be used to disadvantage or harm Woodhull, and is submitting this information pursuant to Protective Order, DA 16-296 as described below. In addition, Woodhull is requesting confidential treatment pursuant to sections 0.457 and 0.459 of the Commission’s rules for the 2015 Service Quality Improvement Plan Progress Report that is required by section 54.313(a)(1) to be attached to this report. Similar to the financial information submitted under section 54.313(f)(2), the information contained in the 2015 Service Quality Improvement Plan Progress Report contains competitively sensitive information, including but not limited to projected build-out plans and capital expenditures, that is secure from public access that could be used by a competitor to disadvantage or harm Woodhull.

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First, Woodhull is submitting the 54.313(f)(2) "Confidential Financial Information" as a "Stamped Confidential Document" with each page bearing the legend CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION, and also submitting the .457 and .459 "Confidential Financial Information" as a "Stamped Confidential Document" with each page labeled "CONFIDENTIAL FINANCIAL INFORMATION - SUBJECT TO PROTECTIVE ORDER BEFORE THE FEDERAL COMMUNICATIONS COMMISSION". The original and one copy of the "Stamped Confidential Document(s)" and accompanying cover letter are enclosed.

Second, Woodhull is submitting the "Stamped Confidential Document(s)" as a "Redacted Confidential Document" where the "Confidential Financial Information" has been redacted. The original and one copy of the "Redacted Confidential Document(s)" and accompanying cover letter with each page labeled "REDACTED - FOR PUBLIC INSPECTION" are enclosed.

FCC Form 481 also will be filed prior to July 1st with the Illinois Commerce Commission.

Please contact me with any questions you have on this filing.

Sincerely,

A handwritten signature in cursive script that reads "Tom Korte".

Tom Korte
Senior Consultant
GVNW Consulting, Inc.
(217) 862-1944
tkorte@gvnw.com

Enclosures

DATE _____

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WOODHULL TELEPHONE COMPANY

**2015 PROGRESS REPORT
ON SERVICE QUALITY IMPROVEMENT PLAN**

2016 ANNUAL REPORT SUBMISSION